# Audit Report

**Global Standard for Food Safety Issue 7: July 2015**

## 1 Audit Summary

| | | | |
|---|---|---|---|
| Company name | Vion Apeldoorn BV | BRC Site Code | 1812048 |
| Site name | Vion Apeldoorn BV | | |
| Scope of audit | The slaughtering of pigs and the deboning, cutting to specification and packing in bulk packaging of pork, including Good Farming-meat | | |
| Exclusions from scope | none | | |
| Justification for exclusion | NA | | |
| Audit Finish Date | 2017-01-31 | | |
| Re-audit due date | 2018-02-04 | | |

## Voluntary modules included

| Modules | Result | Details |
|---|---|---|
| Choose a module | Choose an item | |
| Choose a module | Choose an item | |

## 2 Audit Results

| | | | | | |
|---|---|---|---|---|---|
| Audit result | Certificated | Audit grade | AA | Audit type | Announced |
| Previous audit grade | AA | Previous audit date | 2016-01-26 | | |

| | | |
|---|---|---|
| Number of non-conformities | Fundamental | 0 |
| | Critical | 0 |
| | Major | 0 |

## 3 Company Details

| | | | |
|---|---|---|---|
| Address | **Laan van Malkenschoten 77**<br>**7302** HD Apeldoorn | | |
| Country | **The Netherlands** | Site Telephone Number | **+31 0 555492994** |
| Commercial representative Name | | Email | **@vionfood.com** |
| Technical representative Name | | Email | **@vionfood.com** |

## 4 Company Profile

| | | | | | |
|---|---|---|---|---|---|
| Plant size (metres square) | **<10K sq.m** | No. of employees | **51-500** | No. of HACCP plans | **1-3** |

| | |
|---|---|
| Subcontracted processes | **No** |
| Other certificates held | ISO9001, Chain-of-custody |
| Regions exported to | **Asia**<br>**North America**<br>**Oceania**<br>**Europe**<br>Choose a region<br>Choose a region |
| Company registration number | **EEG 312** |
| Major changes since last BRC audit | **Preparation of investment programme for the site. This programme includes the extension of the cutting department, a new weighing system, system and the installation of the autofoam equipment and technology. The building and installation process has just started and will be running the next 6 months.** |

| Company Description |
|---|
| Vion Apeldoorn BV is a slaughterhouse and industrial butcher. The company is part of the Vion Food group (Vion Food Nederland). The company is slaughtering in general pigs / week ( pigs / hour) at one line. The slaughtering and cutting departments are working in 1 shift; employees. The slaughtered pigs are from Dutch or Belgium origin. Also an amount of hams are received from German slaughterhouses of the Vion company. These are cut to specification for the Italian market.<br>Livestock status from the slaughtered pigs is GF/IKB Welfare, GB/IKB or QS (Belgium origin).<br>Purchasing- and transport process from livestock is organised by Vion Farming (HQ Boxtel).<br>Vion Apeldoorn is producing bulk products (in bone, boneless, hanging products, and packed products) for the European and Asian market (China, Japan). The middles are mainly selected for the bacon production at Vion Scherpenzeel.<br>Sales, transport and purchasing processes are centrally organised by the HQ within Vion.<br>Vion Apeldoorn is USA-approved and is allowed to export to Russia, Oceania, USA and China. EG registration is EG 312 NL. |

## 5 Product Characteristics

| | | | | | |
|---|---|---|---|---|---|
| Product categories | 01 - Raw red meat<br>Category<br>Category<br>Category<br>Category<br>Category | | | | |
| Finished product safety rationale | Fresh pork meat (bulk, carcasses and cut to specification: further processing required), chilled (max. 7 degree), short shelf life, no presence of preservatives, packed at semi bulk level or vacuum | | | | |
| High care | No | High risk | No | Ambient high care | No |
| Justification for area | Production of fresh pork meat which undergo a full cooking prior to consumption. | | | | |

| | |
|---|---|
| Allergens handled on site | **None**<br>Choose an allergen<br>Choose an allergen<br>Choose an allergen<br>Choose an allergen<br>Choose an allergen<br>Choose an allergen<br>Choose an allergen<br>Choose an allergen<br>Choose an allergen<br>Choose an allergen<br>Choose an allergen<br>Choose an allergen<br>Choose an allergen<br>Choose an allergen |
| Product claims made e.g. IP, organic | **None** |
| Product recalls in last 12 Months | **No** |
| Products in production at the time of the audit | **Middles Scherpenzeel, Australian thick flank, neck MB food service (· ), Pharma ham Montenegro (· 3), packaging of organs (diaphragm, livers).** |

## 6.Audit Duration Details

| | | | |
|---|---|---|---|
| On-site duration | 16 man hours | Duration of production facility inspection | 10 man hours |
| Reasons for deviation from typical or expected audit duration | none | | |
| Next audit type selected | Announced | | |

## Audit Duration per day

| Audit Days | Audit Dates | Audit Start Time | Audit Finish Time |
|---|---|---|---|
| 1 | 2017-01-30 | 09.00 | 17.15 |
| 2 | 2017-01-31 | 08.45 | 16.45 |
| | | | |

| | Auditor (s) number(s) | Names and roles of others |
|---|---|---|
| Auditor Number | | , Lead assessor |
| Second Auditor Number | N/A | |

## Present at audit

| Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.9) Name / Job Title | Opening Meeting | Site Inspection | Procedure Review | Closing Meeting |
|---|---|---|---|---|
| Plant Manager | x | x | x | x |
| QA manager | x | x | x | x |
| Production Manager | x | x | | x |
| Planning coordinator | x | | | |

| | | | | |
|---|---|---|---|---|
| HR manager | x | | x | x |
| Supervisor maintenance | x | x | | |
| Manager maintenance | | x | | x |
| Manager slaughtering department | x | x | | |
| Manager cutting department | x | x | | x |
| Manager expedition | x | x | | |
| Manager facility management | x | x | | |
| Finance / calculation | x | x | | |

# Non-Conformity Summary Sheet

| Critical or Major Non Conformities Against Fundamental Requirements | | | | |
|---|---|---|---|---|
| **No.** | **Clause** | **Details of non-conformity** | **Critical or Major?** | **Anticipated re-audit date** |
| | | | | |
| | | | | |
| | | | | |

| Critical | | | |
|---|---|---|---|
| **No.** | **Clause** | **Details of non-conformity** | **Anticipated re-audit date** |
| | | | |
| | | | |
| | | | |

| Major | | | | | | | |
|---|---|---|---|---|---|---|---|
| **No.** | **Clause** | **Details of non-conformity** | **Correction** | **Proposed preventive action plan (based on root cause analysis)** | **Evidence provided document, photograph, visit/other** | **Date reviewed** | **Reviewed by** |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |

| Minor | | | | | | | |
|---|---|---|---|---|---|---|---|
| **No.** | **Clause** | **Details of non-conformity** | **Correction** | **Proposed preventive action plan (based on root cause analysis)** | **Evidence provided document, photograph, visit/other** | **Date reviewed** | **Reviewed by** |
| 1 | 2.2.1 | CP26 is the control of temperature of the sterilizers. Controlled in the slaughtering department 3x/day as part of the SSOP | Description of B.02 sterilizers at F-APD-NL-10.006 is changed. Minimum of 3 measurements of temperature of different sterilizers | Root cause:<br><br>During the yearly review / reassessment of the CP's and internal audits | F-APD-NL-10.006 version 11;<br>10-02-2017 | 2017-02-20 | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | process. In conformity with SSOP/ADP-NL-10006/B02 one of these checks should be done at the last sterilizer in the circulation system of hot water. After verification of the SSOP records of 15/16.11.2016 and week 1-3 it was noticed this isn't done in practise. | a day.<br><br>NC is fully closed | this aspect wasn't noticed.<br><br>Corrective measurement:<br><br>Sharpening check of description at form and practice of the CP's at verification of SSOP check. | | | |
| 2 | 4.3.4 | At the end of the conveyor belt of trimmings of line 3 / processing line of necks, the scraper isn't installed properly. This creates a non-hygienic situation and risk at cross contamination of the necks. | Scraper is installed on line B55.36 at once. The meat is downgraded to cat. 3 materials. The scraper will be checked daily at the pré-SSOP for installation and damages and at the SSOP for right working to prevent a non-hygienic situation and cross contamination. Registration deviation at F-APD-NL-10.005 cutting department 30 of January.<br><br>NC is fully closed. | Root cause:<br><br>The scraper doesn't work very well because of the waste. Preventive the scraper will be reconditioned.<br><br>Verification of the correct working during SSOP has taken place in week 08. | F-APD-NL-10.005<br>Photo scraper | 2017-02-20 | |
| 3 | 4.6.1 | The synthetic/plastic strip at the packaging line of the neck/shoulder meat products is damaged and several parts are missing. | The synthetic/plastic strip at packaging line B62.46 is removed after production and polished. Registration deviation at F-APD-NL-10.005 cutting department 30 of January.<br><br>NC is fully closed | Root cause:<br><br>Missed during SSOP checks.<br><br>Preventive the whole synthetic/plastic strip of the line has been | F-APD-NL-10.005<br>Photo packaging line | 2017-02-20 | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | | | replaced in week 08. | | | |

| Comments on non-conformities |
|---|
| |

# Voluntary Modules Non-Conformity Summary Sheet

| Critical | | | |
|---|---|---|---|
| **No.** | **Clause** | **Details of non-conformity** | **Anticipated re-audit date** |
| | | | |
| | | | |
| | | | |

| Major | | | | | | | |
|---|---|---|---|---|---|---|---|
| **No.** | **Clause** | **Details of non-conformity** | **Correction** | **Proposed preventive action plan (based on root cause analysis)** | **Evidence provided document, photograph, visit/other** | **Date reviewed** | **Reviewed by** |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |

| Minor | | | | | | | |
|---|---|---|---|---|---|---|---|
| **No.** | **Clause** | **Details of non-conformity** | **Correction** | **Proposed preventive action plan (based on root cause analysis)** | **Evidence provided document, photograph, visit/other** | **Date reviewed** | **Reviewed by** |
| | | | | | | | |
| | | | | | | | |

# Detailed Audit Report

## 1. Senior management commitment

### 1.1 Senior management commitment and continual improvement

Vion Apeldoorn BV is part of the Vion Food company; head quarter is located in Boxtel. A clearly quality policy is documented as P-APD-NL-10001, version 12 and is demonstrable signed by the plant manager at 25.01.2017.
The VOS 2.0 systematic for continuous improvement based at lean management is implemented. Most important topics are ownership at shop floor level and more focus for the middle management level to create a good level of sustainable continuous improvement.
The X-matrix is in use for the definition and monitoring of objectives. For 2017 objectives are: investment in internal logistic/routing of the cutting department, implementing of VSLP with use of technique, a new weighing system and the preparation of the start of the production of a retail assortment production for a big new customer (retail company) in the 2nd part of 2017 based at the GF* concept.
Communication is linked to the VOS system: 5x/day team huddles, daily tier1 meetings, weekly tier 2 meetings (trends, MT level), monthly tier 3 meetings (including monitoring progress realisation objectives).
The management review is kept at a quarterly base. The HACCP verification is integrated in the management review report of Q2 2016. Report last management review is demonstrable discussed in the management team at 17.01.2017. (review Q4 2016)
Review is based at review of KPI's, realisation progress realisation X –matrix, complaints and progress improvement projects. .
The company is informed about changes in relevant legislation and technical developments via the QA department of the HQ.
Due date BRC audit is 04.02.2017; so the BRC audit is scheduled on time. The plant manager has attended the opening- and closing meeting.
Outstanding points from the previous BRC audit (1 outstanding minor) is fully closed.

### 1.2 Organisational structure, responsibilities and management authority

**An actual organ chart (P-ADP-NL-10010 version 02.12.2014) is seen. Employees are informed via information boards and internal publications of Vion. The responsibilities, authorities and reporting relationships of all staff members are described in the job descriptions. Responsibilities related to foodsafety and quality aspects are clearly defined.**

### Details of non-applicable clauses with justification

| Clause reference | Justification |
|---|---|
| | |
| | |
| | |
| | |
| | |

## 2 The Food Safety Plan – HACCP

The company's food safety control system is based on the Codex Alimentarius HACCP principles. The HACCP system is implemented and maintained. At VION Food NL corporate level a thorough HACCP analysis (P-VION-10000) is made and available for the sites.

The local process control plan (P-APD-NL-10022; revision 21; 07.10.2016, authorised by the plant manager) was developed by the multi-disciplinary HACCP team. The HACCP system has full management commitment and is an integral part of the company's Quality Management System (QMS). The HACCP system is well documented and effective. Prerequisite program (with 42 CP's) assessed. Full product description including microbiological limits and shelf life is in place.
Daily check at CP's is integrated in the SSOP and pre-SSOP checks. Monthly verification by the QA manager.
The local MT is also the HACCP team; the food safety team leader is demonstrable qualified for this role (bachelor level food technology).

The intended use of the product by the customer has been clearly defined. Vion Apeldoorn is producing B-to-B products. No ready-to-eat or consumer products.
Flow diagrams are documented as P-ADP-NL-10014/version 9; 06.10.2016 Flow diagram Vion Apeldoorn including intestine processing. This is verified for the cutting/processing of Austrialian shoulder meat; no remarks.
The HACCP plan included a review of potential physical, chemical and microbiological hazards. Each identified hazard was reviewed and given a risk rating to define the severity (1 – 3) and likeliness (1 – 3) of a hazard occurring. The risks (R >=3) have been defined from the hazards with adoption of a decision tree: Risk < 3 = PRP, Risk 3 or 4 = CP, Risk 6 or 9 = CCP. The company has defined 6 Critical Control Points (CCP's) relating to product safety and the scope of the BRC audit:

- CCP 1. Faecal contamination of carcasses;
- CCP 2. Temperature control of animal by-products at dispatch + temperature control of (returned) animal by-products at reception;

- CCP 2A: temperature of animal by-products (organs) vacuum packed at dispatch+ temperature control of (returned) animal by-products vacuum packed at reception;
- CCP 3. Temperature control of fresh pork meat at dispatch + temperature control of (returned) fresh pork meat at reception;
- CCP3A: Temperature control of vacuum packed pork meat at dispatch + temperature control of (returned) vacuum pork meat at reception;
- CCP 4. Temperature control of partially chilled pork meat at dispatch.
-

Critical limits have been defined for each CCP and are related to the legal temperature requirements for meat and corporate engagements:

- CCP 1. Zero tolerance for macroscopic visible faecal contamination (hourly, in line measurements)
- CCP 2 – 4. Core temperature of fresh pork meat <7°C, of animal by-products <3°C and of partially chilled pork meat (legs) at dispatch: <33,5°C (sampling for each truck). Surface temperature measurement by means of contact (vacuum packed products) : <6°C.

CCP monitoring has been defined and documented. Records of CCP monitoring and verification show measurements are carried out by authorised persons as planned. This is verified for 15th & 16th of November 2016 (vertical test); no remarks.
The procedures for each CCP identify the corrective action to be taken when the limits are exceeded. Records are kept of adjustments made and any actions taken.

The HACCP system is verified through the internal audit process, the management review/HACCP reassessment (08.07.2016), Q-base management review including food safety KPI review and periodical report.

1 minor is raised for this chapter: the control of CP 42/temperature of sterilizers isn't performed in conformity with the instruction. (minor NC)

**Details of non-applicable clauses with justification**

| Clause reference | Justification |
|---|---|
| | |
| | |
| | |
| | |

## 3. Food safety and quality management system

### 3.1 Food safety and quality manual

The company has a digital quality manual, complying with ISO 9001 and BRC 7 requirements, which demonstrates the company's commitment to quality and food safety.

### 3.2 Documentation control

The documented QMS system is organised and distributed to relevant staff via the electronic quality manual named '. No restrictions for use with valid password.
There are corporate procedures, applicable for all Vion sites. The documentation of these procedures is managed by the corporate QA department. The local procedures and work instructions are managed by the QA manager of the site.
A document control procedure controls the issue of documents to ensure they are at the correct issue status at points of use or reference

### 3.3 Record completion and maintenance

Record verification was part of the vertical audit (Test date 15 & 16 November 2016). All relevant records to the test were found in the archive of records.
Storage term for quality and food safety records is 3 years.

### 3.4 Internal audit

Internal audits are coordinated by QA HQ Boxtel. The internal auditplan 2017 isn't published yet. Schedule is based at 1 unannounced and 1 announced internal audit. On top of that the company is audited ca. 20x/year by local authorities including a system audit by the dutch NVWA and 2nd party audits by customers. In 2016 the site Apeldoorn has had 1* an internal audit at 10.06.2016, the 2nd one was done at 06.01.2017. The internal auditor is demonstrable trained ( , July 2015)).
Audit reports 10.06.2016 and 06.01.2017 are verified. Follow up of the reported minor NC's (10x in June 2016) is demonstrable and effective.

Conformity aspects are also demonstrable part of the internal audit reports.

Hygiene inspections are daily (pre-SSOP's and SSOP's); quarterly verification of the cleaning process. Action points related to the pre-SSOP and SSOP are daily discussed in the tier 1 meetings and corrective actions are taken quick and effectively. Beside the day-to-day there are quarterly inspections done by the managers of the production departments at the construction and prerequisite programme demands of the site. Deviations are discussed in the tier1 meetings and the follow up is demonstrable via action lists.

### 3.5 Supplier and raw material approval and performance monitoring

#### 3.5.1 Management of suppliers of raw materials and packaging

The purchase- and delivery/transport process of pigs is the responsibility of Vion Farming, which is located at the HQ of Vion in Boxtel.
Vion Apeldoorn is taken care of the verification of the administrative documents related to the delivery of

pigs.
The approval and assessment process of suppliers of non-food is centrally organised and managed by the central purchasing department at HQ Vion.
The plant is reporting complaints and gives input for the assessment at a yearly base. Report about assessment results 2016 is seen; there no bad performing suppliers in Apeldoorn.

### 3.5.2 Raw material and packaging acceptance and monitoring procedures

Control of administrative documents related to the delivery of livestock. (IKB/UBN nr, origin). Also check at animal welfare aspects.
Incoming packaging products are controlled at quantity, traceability and quality aspects. Records seen of incoming batch of blue slipcovers, used for the packaging of pork heads (vertical test) at 11.07.2016 (vertical test); no remarks.

### 3.5.3 Management of suppliers of services

The plant is reporting complaints and gives input for the assessment at a yearly base. Is verified for the plant assessment of supplier , (pest control) and (Laundry) over 2016 and is demonstrable.

### 3.5.4 Management of outsourced processing and packing

Not applicable, no outsourced processing and packing

### 3.6 Specifications

Specifications for raw materials, packaging materials, cleaning agents and finished product are defined and managed by the involved departments.

During the audit the following specifications were sampled:
- LDPE slipcover blue
- Pork head
- Neck MB;
- Pharma ham Mondena cut;

These specifications were available in an actual version.

Specifications are available for relevant staff (MT).
Due to changes in data management, product reallocation en preparation for the new labelling system a review process to update each specification is running. Coordinated and performed by Vion HQ (Master data management).

### 3.7 Corrective and preventive actions

The system of lean management / VOS 2.0 is used for the management of corrective and preventive actions.
There are team huddles, 3x shift, with a defined agenda. Daily tier 1 meeting and weekly tier 2 meetings. Escalation model in order to manage a timely corrective action.

In case of the need of an in-depth root cause approach A4 (tier 1 level) and A3 (MT level) forms are in use. This is verified for the recent A4 process for the corrective measurement to improve the temperature process of organs. The A4 process has resulted in extra ventilation capacity, the use of a new type of crate and other internal appointments about the internal logistic during the chilling process of organs. Verification reports are seen (graphics about the temperature course of diaphragm during the chilling process, the effect of the new process is significant).

## 3.8 Control of non-conforming product

Non-conforming products / products on hold are physically identified as such. In the expedition area a dedicated corner is seen for returned products from customers and non-conforming products. During the site audit no blocked batches were seen.
The expedition supervisor and production manager are authorised to release a blocked batch. The QA manager is verifying the process at a regular base.

The registration forms of blocked and returned batches in 2016 and first weeks of 2017 are verified. Files are complete; release of batches is done in conformity with the procedures.

## 3.9 Traceability

Traceability system is developed. It covers raw materials through work in progress to finished product including packaging materials and distribution. This system is fully based on written documents, batch codes and bar codes according to 'procedure identification':

- Pigs bear an earmark (+ accompanied by track record and VKI)
- Half carcasses get an EG-mark + serial number (together with date of slaughter + livestock status / origin)
- Technical parts get a batch code (EG-mark + date of production + origin)
- By-products get a batch code (date of slaughter / production)
- Primary packaging materials are traceable via the first- and last date of use of a batch
- Returned product (destination form).

No consumer packed end products are applicable.

A vertical test was part of the site audit. The product pork head ( ), packed and dispatched at 16.11.2016 was the trial. Slaughter date was 15.11.2016. The product was produced from livestock with the sniffing disease. It's not allowed to export those products to China. Traceability was possible within 4 hours. All relevant documents (dispatch documents, CCP records, livestock information, pre-SSOP, SSOP, pre-shipment, registration of knife management) were all found. It's clearly demonstrated the batch isn't used for export to China (consignment notes are seen).

## 3.10 Complaint handling

Complaints are received via the complaints inbox of the system (complaint registration system of Vion). The QA manager is taken care of a quick response to the complaining customer.
The complaints process is verified for complaint nr (poor delivery performance) and the complaints from Vion to the supplier of freezing mats) at 03.10.2016. Both complaints are processed in conformity with the complaint procedure.

Periodic complaint analysis is part of the monthly quality report and the quarterly management review. Decreasing trend in the number of complaints, the complaints costs are increasing due the increasing claim culture within the meat industry.

| 3.11 Management of incidents, product withdrawal and product recall |
|---|
| Vion has 3 slaughterhouses. In case of incidents related to business continuity, production volumes are reallocated between the remaining slaughterhouses. For that purpose the SKAL certification (production of bio products) for Apeldoorn will be updated next months.<br>Vion has a centrally recall protocol: P-VION-10015.<br>Mock up recalls are kept at a yearly base, the last one at 12 January 2017. The report of the mock-up recall is seen; in depth report. 2 corrective actions are defined and in process.<br>In 2016 the company doesn't have had a product recall.<br>The certification body will be informed in case of a product recall (.described in P-VION-10015). |
| **3.12 Customer focus and communication** |
| The sales department is centrally organised within Vion. No local sales managers. |
| In case of new customers or dedicated customer demands related to cuts, the local MT and/or production managers are involved to adjust this into specifications and instructions for the employees. |

**Details of non-applicable clauses with justification**

| Clause reference | Justification |
|---|---|
| 3.5.4. | No outsourced processes |
| | |
| | |
| | |

## 4. Site standards

### 4.1 External standards

The site is located at the industrial estate of Apeldoorn-South. Local activities give no potential risk. A veal slaughterhouse is located at the other side of the road, no direct risks for cross contamination.

External areas are paved and well maintained. The building fabric is also well maintained.

The investment project to enlarge the building to expand the cutting department has just started. Ground - and pile activities are running.

## 4.2 Security

The site is completely surrounded by fencing. There's site security by porter arrangements (2-shifts) and by an external contracted security service during night hours. Controlled entrance for staff in place with badge control on all potential entry points to the plant. Staffs have been trained in site security procedures. Registration of visitors is part of the intake procedure at the porter lodge. The site is registered by the NVWA (official approval EG 312 NL).
The security arrangements are yearly reviewed as a part of the reassessment process.

## 4.3 Layout, product flow and segregation

The processing and packaging parts of the production are designed to prevent contamination risk. Based upon a risk assessment and the BRC decision tree all zones are "low risk areas". Site plan assessed and is up-to-date.
No high risk, high care or ambient high care.
Recently a clearly described zoning by colour for the plant is introduced. The plant has 8 zones. Each zone has dedicated instructions about safety aspects (helmet, ear protection, safety boots) and hygiene aspects (for example clothes, snoods, disinfecting of shoes).
The workers of the "dirty" slaughtering department have their own sanitary facilities. Premises are suitable for the intended purpose. Process flow is straight forward and agreed with the Dutch Food Authority. (NVWA)
During the site audit, building activities were in place at the outside areas. No contamination risks were seen.

For this chapter 1 minor NC is raised: the scraper at the end of the conveyor belt of necks wasn't installed properly, which created a non-hygienic situation.

## 4.4 Building fabric, raw material handling, preparation, processing, packing and storage areas

The fabric and internal condition of the site was suitable and satisfactory for the process. Walls, ceilings and floors were generally suitable.

Based at the results of the monthly hygiene audits and daily SSOP checks a continuous maintenance programme is running to maintain the condition of the site. Walls, ceilings and floors were generally suitable. Indoor storage of packaging materials.
The China packaging process is located in the corridor between chilling – and packaging areas. Narrow and limited working space for the workers. This situation will be solved after finalizing the current investment process in the expanding of the cutting and packaging department.
Drainage is sufficient.
Ceilings and overheads are made of cleanable materials.
Tube lights are adequately covered. Condition is controlled daily with SSOP checks.

Stunning process with CO2 equipment. Process of unloading pigs, floating of pigs into stable and towards the process is good organised with visible attention for animal welfare aspects.

## 4.5 Utilities – water, ice, air and other gases

Utilities constructed, maintained and monitored to a good degree. The water used for cleaning and process is water from mains supply. This has been tested 4 times a year for both microbiological and

chemical quality. The samples are analysed by (ISO 17025 accredited laboratory). Water quality is defined as a general control measure. A water distribution plan is available.

The results of the monitoring plan 2016 (results dated 11.03.2016, 21.06.2016, 22.09.2016 and 28.12.2016) are verified; all results were within the legislation standards.

## 4.6 Equipment

Equipment was seen as suitably designed and used to minimise potential contamination. The used equipment is suitable for its purpose. Use of well-known brands of equipment for food applications. New equipment is purchased as required and specified.

For this chapter 1 minor NC is reported: at the conveyor belt of the packaging line shoulder/neck meat a damaged protection strip was found, several parts are missing.

## 4.7 Maintenance

Each device and machine has its own logbook, in which all breakdowns and maintenance works are recorded. Is verified for the vacuum packaging equipment ( ) and evisceration equipment in the slaughtering department.
Scheduled maintenance work is listed in an excel file. This is verified for the slaughtering department. The The maintenance check of the equipment (gas stunning) is part of this weekly inspection. maintenance programme is only used for administrative purposes.
The actual list is work orders is verified: priorities are set; orders related to food safety aspects are processed with a high priority, backlog is limited and all orders are scheduled. KPI's maintenance are defined and the trends are developing favourably. The outstanding minor NC from the previous BRC audit at this topic can be fully closed.

Daily team huddle with the technician. Feedback about daily maintenance works and breaks downs in the Tier1 meeting.
Temporary repairs are taken place, but finalised ASAP but within at least one week.
Hygiene clearance is the responsibility of the supervisors of the production areas (SSOP).

In the slaughtering department old rusty cable trays were seen close to the scalding equipment. This is listed at the list of necessary building works 2017.

In order to reduce the contamination with lubricant new transport chains are installed (synthetic) and a new lubricating plan is in preparation. The storage of lubricants is checked; MSDS sheet of lubricant - is verified; actual specification; no issues identified.

## 4.8 Staff facilities

There are two separate staff facilities (m/w): one for the employees of the dirty slaughter department and one for the pork cutting and expedition department. The staff facilities were seen as satisfactory designed. They are in good order, clean and in a good state of maintenance. The surface of storage facilities (staff lockers) is in line with the number of employees. No high risk areas/high risk areas. Hand-washing facilities (with hand-free soap tap operation and single use paper towels) were provided in toilets and at entry points to production areas. Before entering the production areas a sole washer and hand disinfecting equipment is installed; tourniquet system.
The factory is totally non-smoking. Smoking is only allowed in a separated area of the rest room. Catering

facilities are provided for staff. The canteen has its own HACCP plan and procedures.

### 4.9 Chemical and physical product contamination control

#### Raw material handling, preparation, processing, packing and storage areas

Control over cleaning chemicals on site was verified during the site audit.

#### 4.9.1 Chemical control

Separate storage facility for cleaning chemicals in place (container). The storage was locked during the site audit. New storage, with sufficient drip tray facilities. Authorised access by production department and cleaning contractor. MSDS available and specifications confirm suitability for use in food processing industries. MSDS sheet of is verified; no remarks.

#### 4.9.2 Metal control

The HACCP study has determined that metal detection is not necessary a CCP. The metal detector is checked during production by the employee of the slaughter by-products department. Only tongues are tested, because pigs can eat some small metal parts which can be found in tongues. Metal hazard is controlled by metal checks (machine / knife intactness / counting numbered sets) in relation to the hazard analysis. Registration and corrective actions could be demonstrated. A knife handling policy is in place. Records of knife counting at 15 & 16 November 2016 are seen (vertical test).

#### 4.9.3 Glass, brittle plastic, ceramics and similar materials

A glass / hard plastic register is in place and records the location and condition of glass / hard plastic. This is verified for the tube lights in the storage area of work clothes, this area is listed at the actual glass register. Glass / hard plastic audits are regularly carried out: by production department (daily pre-SSOP and SSOP) and by QA (reduced check: 1 x / month for open product situations –and full inspection: 4 x / year). Records of breakage and corrective actions are listed.

#### 4.9.4 Products packed into glass or other brittle containers

No use of glass or other brittle containers as packaging material

#### 4.9.5 Wood

Wooden pallets are not permitted in production areas.

### 4.10 Foreign-body detection and removal equipment

#### 4.10.1 Foreign-body detection and removal equipment

Foreign body alertness has the attention of all people dealing with products. Metal detection device (CP) is applied for tongues. During the site audit no tongues were packed. Records of the control of the metal detector were seen. The records of the control of the metal detector at the 15th of November 2016 (vertical test) is seen; no remarks.
No consumer packed end products are applicable.

| 4.10.2 Filters and sieves |
|---|
| No use of filters or sieves in this plant. |
| **4.10.3 Metal detectors and X-ray equipment** |
| The used metal detector is based at a belt stop system.<br><br>Check at performance before and after the packaging process of tongues. |
| **4.10.4 Magnets** |
| No use of magnets in this plant |
| **4.10.5 Optical sorting equipment** |
| No use of optical sorting equipment in this plant. |
| **4.10.6 Container cleanliness – glass jars, cans and other rigid containers** |
| No use of container cleanliness equipment. |
| **4.11 Housekeeping and hygiene** |
| The company has a contracted specialised cleaning company for the daily cleaning and disinfection of the plant. The cleaning schedule is seen. 1* week the plant is disinfected with a disinfectants at chloride base to prevent resistance.<br>Periodic cleaning is scheduled 2x/year.<br>Daily check at visual quality of cleaning in the pre-SSOP controls. Records are seen from 15.11.2016 and 16.11.2016(vertical audit). Corrective actions are clearly defined and timely handled.<br><br>Weekly control at disinfection process by agar checks. Results 2016 are verified. Incidental higher values, corrective actions are demonstrable, but overall good results. Agar plan is sampled for the ham plate cutter in the cutter department and this tool is part of the agar plan.<br>Residue checks are done at a 2-weekly base.<br>Results of agar checks are reported periodically and as a KPI in the Q-base management review. |
| **4.11.7 Cleaning in place (CIP)** |
| The company has a tank for the storage of human blood. There's a CIP cleaning at this tank. The tank is owned by the customer of the human blood ( ), the CIP process is not the responsibility of Vion Apeldoorn and not a part of the scope of the BRC audit. |
| **4.12 Waste / waste disposal** |
| During the site audit a good control was seen over the collection and disposal of waste. Waste disposal is handled by licensed contractors: (paper, plastic, etc), (category 2-3 material) and (blood). A register is kept. Legal requirements are met, e.g. separate storage and clear identification. |

## 4.13 Management of surplus food and products for animal feed

NA, in conformity with the legislation it's not allowed to give surplus food an animal feed destination.

## 4.14 Pest Control

The company has a contract with a specialised pest control company. Inspection frequency 8*/year; in depth audit 1*/year. There's an overall contract with a pest control company for all Vion plants in the Netherlands since April 2016.
Limited internal activity of mousses (canteen, technical areas, not in chilled areas). In 2016 several actions have taken place to improve the condition of the building and good housekeeping related to the pest control programme. For example all dock shelters are renovated to minimise the risk of incoming pests via the dock shelters.
The new pest control company has actualised the site plan.
The training of the pest control inspector, is verified, he's demonstrable qualified until 16.04.2021.
The yearly in-depth audit is done as part of the intake process of the new pest control company. The recommendations reported are all followed and processed demonstrable. In the digital portal a score card systematic is integrated. This gives an indication of the pest control activity of the plant.
The trend report 2016 is integrated in the HACCP reassessment report.

## 4.15 Storage facilities

The plant has the possibility for internal storage in chilled storage area (chilled or frozen).
General handling procedure and temperature control (with automatic temperature monitoring and alarm system) is applicable during storage and loading of raw materials and final products. Temperature of storage areas of carcasses (chilling nr 6) is verified for 15 & 16 November 2016 (vertical audit). Temperature was < 3 °C.
No outside storage of raw materials or final products applicable, only from technical materials.
Stock rotation based at FIFO.

## 4.16 Dispatch and transport

Dispatch and release of products is based at the preshipment protocol of Vion (CCP verification).
Products and trailers are inspected before loading. Product is loaded in covered bags. Only use of approved transport companies. All transport is subcontracted following the central arranged procedure.
VION Food (central office) is contract owner. The content of the contract complies with the requirements.
VION reviews the performance of these transport companies ( ) by transport audits. In 2016 6 transport audits are kept. Is verified for Distrifresh; report 21.06.2016, report 19.07.2016 and ; report 20.10.2016; the 3 reports show good results.
Dispatch process is verified for 16.11.2016; the dispatch of the pork heads to (vertical test). CCP checks and preshipment procedures are followed demonstrable; records are seen.

## Details of non-applicable clauses with justification

| Clause reference | Justification |
|---|---|
| 4.3.5., 4.3.6., 4.3.7., 4.4.4., 4.4.13, 4.8.4., 4.8.5. | No high-risk, high care or ambient high care based upon appendix 2 risk zone decision tree |
| 4.9.2. | No use of strongly scented or tain-forming materials |
| 4.9.4. | No products packed into glass or other brittle containers |
| 4.10.2 | No use of filters and sieves |
| 4.10.3. | No use of metal detectors |
| 4.10.4. | No use of magnets |
| 4.10.5 | No use of optical sorting equipment |
| 4.10.6 | No use of container cleanliness equipment |
| 4.11.7 | No CIP cleaning |
| 4.13 | No production of animal feed |

## 5. Product control

### 5.1 Product design/development

No product design /development activities are taken place at this site. No production of consumer products. At corporate level a development procedure is available. Systematic HACCP analysis and food safety assessment is integrated in the process of developing new products or modifying existing products. The validation of the new chilling process of organs is verified; this is linked to an A4 improvement plan. Validation is clearly founded with graphics.
New cuttings are tested first in the production departments and samples are discussed with the customer before a new product is accepted. Factory trials are undertaken. Regular shelf life testing takes place according to central procedure 'Houdbaarheidsonderzoeken'. Results site Apeldoorn 2016 are verified: product neck ZB with dry ice. Results (PCA, entero's and Pseudomonas) are all within the standards. Results are published in quality trends. No claims labelled.

## 5.2 Product labelling

Vion Apeldoorn BV is producing single meat products. Labelling aspects are production date and land of origin. This verified for the labelling of China products, produced at 16.11.2016 (vertical test). For products, based at Belgium pork, the text 'born in Belgium' is in use, the same situation is suitable for the ham products from German origin.

## 5.3 Management of allergens

Not applicable, the company is only producing fresh meat. No allergens used or present at the site

## 5.4 Product authenticity, claims and chain of custody

The company has 2 product integrity lines: Welfare and QS (Belgium). In case of a main breakdown in the site of Vion in Groenlo, Vion Apeldoorn BV is the back-up location for the slaughtering of bio pigs. The company has had a SKAL recognition for this purpose and this will be again requested next month.
The company is audited 2x / year against the requirements of the chain-of-custody. There are no structural issues reported during this audit. This is a certification standard related to product integrity of sustainable meat.
Daily check at mass balance and reported at a weekly base to the site manager..

## 5.5 Product packaging

Packaging is segregated from raw materials and finished products. Return of packaging materials towards storage area does not take place. Coloured in liners are applied depending on the content and origin of the lifestock (GB, Welfare, QS). Based upon sampling packaging materials specifications reveal food safe declaration, e.g. Regulation 1935/2004/EC. Packaging of products from vertical audit checked (Blue LDPE bags) assessed including declaration of conformity.
The storage area is improved in comparison with the previous audit. Corrective measurements have been taken to reduce the smell of the intestines processing department, which is located beside the storage area.

## 5.6 Product inspection and laboratory testing

### 5.6.1 Product inspection and testing

All microbiological analyses are outsourced to a contracted ISO17025 recognised laboratory
Shelf life tests are taken place, but his is coordinated by the central QA department in Boxtel.
Daily samples at carcasses (PCA, entero's) and weekly check at several pathogens (Salmonella, Lysteria). Reports of result in Quality Trend. Lysteria results were good until June 2016. This has resulted in an intensive sampling plan of conveyor belts in the cutting department. Finally the hazard was found and after the installation of new demountable conveyor belts the Listeria problems are solved. No Lysteria is found in the last months.

### 5.6.2 Laboratory testing

All microbiological analyses are carried out by the contracted external laboratory

### 5.7 Product release

Product release is based at the preshipment procedures. Product release is based upon product temperature measurements (CCP) before dispatch. 5 samples are taken from every batch. Checked during vertical audit and site tour; good organised. No positive release systems in place. Only authorised personnel (QA manager / production manager) are allowed to release non-conforming products. Product release is done by the QA Manager / Plant Manager / production manager.

### Details of non-applicable clauses with justification

| Clause reference | Justification |
|---|---|
| 5.2.3. | No products with claims |
| 5.2.4. | No use of labels, prescribed by customers |
| 5.3. | No allergens on site |

## 6. Process control

### 6.1 Control of operations

The site clearly demonstrates a good control of operations. Process conditions and methods are well checked. Systematic monitoring is demonstrated. Is verified for the daily SSOP checks of the process in the dirty slaughtering department. Process checks done at animal welfare aspects, stunning (CO2), scalding and killing. Standards are defined in document process check dirty slaughtering. No deviations seen. Good practise seen for animal welfare aspects: quiet and controlled atmosphere in the stable of livestock.
During production the correct application of CCP's is monitored and verified on a day to day basis. Processes are validated to demonstrate that the process is capable of producing safe, legal and quality products.
Process control is based upon the HACCP study, legal and customer requirements. The main change-over moment in the process is the startup of the process in the morning. This is controlled via the pre-SSOP systematic (cleaning, sterilizers, glass, maintenance checks). Good organized; corrective actions are done and reported in case of deviations.

### 6.2 Labelling and pack control

The used procedures to control labelling and pack control are documented as P-ADP-NL-10181 vs 23.01.2016.

For the Japan, Korea and China product the 1st and last used label of a batch is stucked on a recording form to control the use of the right label. Process and registrations are verified of the 16th of November 2016 (vertical test).

### 6.3 Quantity, weight, volume and number control

All products are sold and invoiced by actual weight. controls the balances for commercial purpose. The devices are tested internally on a daily basis. Weighing equipment (legal) is calibrated once a year. Records were available. Is verified for the floor scale (expedition; calibrated at 20.06.2016); calibration certificate was seen.

### 6.4 Calibration and control of measuring and monitoring devices

Calibration procedures ensure relevant equipment is identified and regularly calibrated. Critical measuring equipment is thermometers (CCP related) and weighing scales. Calibration with 2-monthly frequency (thermometers CCP), 6-monthly frequency (other thermometers) or yearly frequency (balances, PT 100) is adequate according to the calibration records. No adjustments are possible. Records checked; no remarks.

### Details of non-applicable clauses with justification

| Clause reference | Justification |
|---|---|
| 6.2.4. | No use of in line vision equipment |
| | |
| | |

## 7. Personnel

### 7.1 Training: raw material handling, preparation, processing, packing and storage areas

New (temporary) workers are trained and instructed before they start working. There's an instruction film in several languages for this purpose. Records of this introduction training are verified for temporary worker (16.12.2016), (12.04.2016) and (18.01.2017). Effectiveness of training is verified by the use of questionnaires, new workers should have a result of 80%.
Refresher training is organised at a regular base. Seen for and at 23.06.2016 and (31.05.2016).
Employees, taken care for CCP controles, are demonstrable trained. Verified for and (CCP 1 at 24.01.17) and (CCP 2,3,4) at 16.01.17.
Animal welfare training and at 23.04.2016.

All sampled training records were demonstrable.

| 7.2 Personal hygiene: raw material handling, preparation, processing, packing and storage areas |
|---|
| The standards for personal hygiene, dress code, medicines, jewellery and medical screening have been defined and communicated to all personnel through brochure and company film "Werken bij VION" (in different languages) prior to commencing work. These are also part of the housekeeping instructions inside Vion.<br>The wearing of jewellery isn't allowed. |
| **7.3 Medical screening** |
| The medical screening is part of the intake of new employees and part of the instructions to visitors. The site makes all visitors, new starters and contractors aware of the need to report infectious disease via the food safety instruction. Employees, visitors and contractors have to complete a health questionnaire prior to entry to any production areas. Persons who are suffering from a relevant infectious disease are not allowed to enter the production facilities.<br>Medical screening documents are verified of and and these are available and signed by the employees and doctor. |
| **7.4 Protective clothing: employees or visitors to production areas** |
| All employees (including temporary workers and visitors) are wearing protective clothing (inclusive work shoes). Protective clothing includes white or blue trousers, jackets and rubber boots / shoes. Disposable hairnets are applied, all hair is enclosed. Disposable gloves are worn where necessary. Protective clothing is removed when the employee is leaving the production areas. Operators know the house rules very well on gloves. Good adherence to the dress code observed during the site evaluation. The external laundry ( ) complies with the requirements of the Global Standard for Food Safety. This is a low risk operation.<br>There are sufficient facilities to clean shoe soles, gloves and knifes. |

**Details of non-applicable clauses with justification**

| Clause reference | Justification |
|---|---|
| | |
| | |
| | |
| | |

| Module 8 - Traded Goods | |
|---|---|
| Scope | |
| 8.1 Approval and performance monitoring of manufacturers/packers of traded food products | |
| | |
| 8.2 Specifications | |
| | |

| |
|---|
| 8.3 Product inspection and laboratory testing |
| |
| 8.4 Product legality |
| |
| 8.5 Traceability |
| |

| Module 9: Management of Food Materials for Animal Feed | |
|---|---|
| Scope | |
| 9.1 Management Commitment | |
| | |
| 9.2 HACCP | |

## 9.3 Outsourced Production

## 9.4 Specifications

## 9.5 Traceability

## 9.6 Chemical and Physical Product Contamination Control

## 9.7 Labelling

## 9.8 Training

## Module 11: Meat supply chain assurance

| Scope | |
|---|---|

### 11.1 Traceability

### 11.2 Approval of meat supply chain

### 11.3 Raw material receipt and inspection

### 11.4 Management of cross-contamination between species

### 11.5 Product testing

## 11.6 Training